



Eckert Seamans Cherin & Mellott, LLC
1717 Pennsylvania Avenue, NW
12th Floor
Washington, D.C. 20006

TEL 202 659 6600
FAX 202 659 6699
www.eckertseamans.com

Raymond A. Kowalski
rkowalski@eckertseamans.com
202-659-6655 (phone)
202-659-6699 (fax)

Charles A. Zdebski
czdebski@eckertseamans.com
202-659-6605 (phone)
202-659-6699 (fax)

March 9, 2011

Ex Parte

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

**Re: In the Matter of Implementation of Section 224 of the Act,
WC Docket No. 07-245**

Dear Ms. Dortch:

On behalf of Ameren Missouri, we submit the following in response to Suddenlink's and Mediacom's written *ex parte* communication dated February 10, 2011.

Suddenlink's and Mediacom's letter states, "the costs of attachment incurred by providers with large rural footprints is much higher than that in urban or suburban areas with lower pole per customers served densities." The letter cites as an example Mediacom's customer density as it relates to pole attachments in Callaway and Cole Counties in Missouri, which are in Ameren Missouri's service area.

Using Mediacom's statistics noted in their *ex parte* filing, a breakdown of pole attachment costs can be calculated. An average triple-play customer pays approximately \$150 per month for phone, Internet and TV. That equates to \$1,800 per year. At an average of 4.4 poles per 10 customers (urban), Mediacom pays ~\$12.50 per year per customer (\$1.04 per month) for attachment space rental (at the calculated Ameren Missouri telecom rate), roughly 0.7% of the customer's bill. At an average of 7.4 poles per 10 customers (rural), Mediacom pays ~\$21.00 per customer per year (\$1.75 per month) for attachment space rental, roughly 1.2% of the customer's bill.



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This actual-cost analysis shows that the difference between attachment costs for urban versus rural areas is about \$.71 per month per customer. Bearing in mind that the customer pays approximately \$150 per month for triple play service, the cost of pole attachment space rental is a minor item, even in rural areas.

Respectfully submitted,

A handwritten signature in cursive script that reads "Raymond A. Kowalski".

Raymond A. Kowalski
Charles A. Zdebski

cc: Scott A. Liebel, P.E.
Supervisor of Joint Use Services
Ameren Missouri